

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :
: :
-v.- : 18 Cr. 693 (RMB)
: :
: :
RAMSES OWENS, : :
a/k/a "Ramses Owens Saad," : **Oral Argument Requested**
DIRK BRAUER, :
RICHARD GAFFEY, :
a/k/a "Dick Gaffey," and :
HARALD JOACHIM VON DER GOLTZ, :
a/k/a "H.J. von der Goltz," :
a/k/a "Johan von der Goltz," :
: :
Defendants. :
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**RICHARD GAFFEY'S NOTICE OF MOTION
FOR AN ORDER COMPELLING THE GOVERNMENT
TO IDENTIFY THE DOCUMENTS IT INTENDS TO USE AT TRIAL**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Richard Gaffey's Motion for an Order Compelling the Government to Identify the Documents It Intends to Use at Trial and upon the accompanying Declaration of Robert B. Buehler, dated May 7, 2019, and upon the accompanying Declaration of Rory Cahill, dated May 7, 2019, Richard Gaffey hereby moves this Court, before the Honorable Judge Richard M. Berman, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order directing the government to identify the documents it intends to use at trial and for such other relief as the Court deems appropriate.

Dated: New York, New York
May 7, 2019

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TO:

Clerk of the Court
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Honorable Richard M. Berman
United States District Judge
Southern District of New York